

Hearing Date and Time: 9/26/11 9:45 a.m.  
Response Deadline: 9/19/11 4:00 p.m.

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re

MOTORS LIQUIDATION COMPANY,  
et. al. f/k/n General Motors Corp., et al.

Debtors

Chapter 11  
Case No. 09-50026(REG)

(Jointly Administered)

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**RESPONSE TO 244<sup>TH</sup> OMNIBUS OBJECTION TO CLAIMS AND  
MOTION REQUESTING ENFORCEMENT OF BAR DATE ORDERS**

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Damon Morey LLP, attorneys for Relco Systems, Inc., hereby responds to the Debtors' 244<sup>th</sup> Omnibus Objection to Claims and Motion Requesting Enforcement of Bar Date Orders (ECF Docket No. 10747)

1. Relco Systems, Inc. ("Relco") timely filed a Proof of Claim on February 10, 2010 pursuant to the "Property Bar Date" Order of December 18, 2009 (ECF Docket No. 4681).

2. Relco has a place of business located in Bedford, Indiana and received a pre-printed Proof of Claim form together with a Notice of Deadline for Filing Certain Proofs of Claim ("Notice"). (A copy is annexed as **Exhibit A**).

3. The Notice advised that the Bankruptcy Court entered a Supplemental Bar Date Order on December 18, 2009 establishing a "Property Claims Bar Date" of February 10, 2010 at 5:00 P.M. Eastern Time based on pre-petition claims against any of the debtors arising from being located adjacent to, in the proximity of, the properties listed in an annexed schedule.

4. Relco's place of business is in the proximity of one of the listed properties, a Stamping Plant in Indianapolis, Indiana, and in addition, is adjacent to the GMPT Bedford Casting Plant located at 105 GM Drive, Bedford, Indiana of which there is an ongoing environmental clean up.

5. In compliance with the Supplemental Bar Date Order, Relco filed its proof of claim on February 10, 2010 (copy annexed as **Exhibit B**), which was assigned Claim No. 70019.

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6. Thereafter, on about May 7, 2010, Relco filed an Amended Proof of Claim together with a Claim Liquidation Letter specifying an unsecured claim of \$297,200.

7. Since Relco has timely complied with the Supplemental Bar Date Order and, as conceded in the Debtor's own schedules, filed its Proof of Claim on February 10, 2010, its Proof of Claim was timely filed and the Debtor's 244<sup>th</sup> Omnibus Objection has

no merit and should be denied as to Relco.

Respectfully,

DAMON MOREY LLP

By /s William F. Savino

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*Attorneys for Relco Systems, Inc.*

Dated: Buffalo, New York  
September 12, 2011

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